

1 ALICE CHANG (SBN 239761)  
2 alicechangjdmba@gmail.com  
3 13048 Del Monte Dr, Apt 42F  
4 Seal Beach, CA 90740  
5 Telephone: (714) 507-6161

6 Rebekah L. Bailey (SBN 258551)  
7 bailey@nka.com  
8 NICHOLS KASTER, PLLP  
9 4700 IDS Center; 80 South 8th Street  
10 Minneapolis, MN 55402  
11 Phone: (612) 256-3200; Fax: (612) 215-6870

12 Attorneys for Plaintiffs-Relators

13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION**

**UNITED STATES OF AMERICA**  
*ex rel.* **IONM LLC**, a Delaware  
corporation and *ex rel.* **JUSTIN**  
**CHEONGSIATMOY, M.D.; STATE**  
**OF CALIFORNIA** *ex rel.* **IONM**  
**LLC**, a Delaware corporation and *ex*  
*rel.* **JUSTIN CHEONGSIATMOY,**  
**M.D.; LOS ANGELES COUNTY** *ex*  
*rel.* **IONM LLC**, a Delaware  
corporation and *ex rel.* **JUSTIN**  
**CHEONGSIATMOY, M.D.; and**  
**JUSTIN CHEONGSIATMOY,**  
**M.D.**, in his individual capacity,

Plaintiffs,

v.

**UNIVERSITY OF SOUTHERN**  
**CALIFORNIA**, a California  
corporation,

and

**USC CARE MEDICAL GROUP,**  
**INC.**, a California corporation,

Defendants.

Case No. 2:18-cv-08311-ODW (ASx)

**DECLARATION OF  
MATTHEW H. MORGAN IN  
SUPPORT OF APPLICATION  
OF NON-RESIDENT  
ATTORNEY, MATTHEW H.  
MORGAN, TO APPEAR IN THIS  
CASE *PRO HAC VICE***

1 I, Matthew H. Morgan, declare as follows:

2 1. I am a Partner with the law firm of Nichols Kaster, PLLP and have been  
3 retained as co-counsel to Alice Chang, Esq. by Relator IONM LLC and Plaintiff-  
4 Relator Justin Cheongsiatmoy, M.D. in the above-captioned action.

5 2. I submit this declaration in response to the Court's Order to Show Cause,  
6 (ECF 120), and in support of my application for permission to appear in this case *pro*  
7 *hac vice*. (ECF 118).

8 3. I have personal knowledge of all matters set forth herein, except as to  
9 any matters stated on information and belief, and as to those matters, I am informed  
10 and believe them to be true. If called to testify thereto, I could and would competently  
11 do so.

12 4. On February 7, 2022, Attorney Chang filed an application of non-  
13 resident attorney in support of my request for permission to appear in this matter *pro*  
14 *hac vice*.

15 5. At the time Ms. Chang filed my *pro hac vice* application, I was unaware  
16 of any restriction to Attorney Chang's admission status with the State Bar of  
17 California or to the Central District of California which would prohibit her from acting  
18 as qualified sponsoring counsel to my application to appear *pro hac vice* in the above-  
19 captioned action.

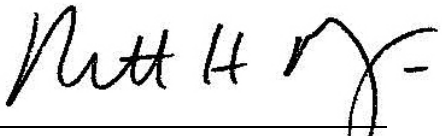
20 6. Following this Court's Order to Show Cause (ECF 120), Attorney Chang  
21 communicated that she paid a renewal fee of \$25 to the Central District of California  
22 and updated her physical address with the State Bar of California, the Central District  
23 of California, and PACER. Based on communications with Attorney Chang, it is my  
24 understanding that this address reflects the place where she maintains an office for the  
25 practice of law.

26 7. On information and belief, Attorney Chang is qualified sponsoring  
27 counsel to my application to appear *pro hac vice* in the above-captioned action as  
28 required by L. R. 83-2.1.3.4.

1           8.     This belief is based on communications with Attorney Chang, Attorney  
2 Chang's declaration submitted in response to this Court's Order to Show Cause (ECF  
3 124), and her admission status as provided on the State Bar of California website (see  
4 <https://apps.calbar.ca.gov/attorney/Licensee/Detail/239761>) and the Central District  
5 of                   California's                   website                   (see  
6 <https://www.cacd.uscourts.gov/attorneys/admissions/attorney-admissions-search>).  
7

8           Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws  
9 of the United States of America that the foregoing is true and correct.  
10

11 Dated: February 17, 2022

12 By:   
13 Matthew H. Morgan (MN Bar No. 304657)  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28